

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**

Annual Section 64.2009(e) CPNI Certification for 2019, covering prior year 2018

Date Filed: February 28, 2019

Name of companies covered by this certification: Northern Arapaho Tribal Industries, Inc. d/b/a Wind River Internet

499 Filer ID No.: 832482

Name and Title of Signatory: Patrick A. Lawson

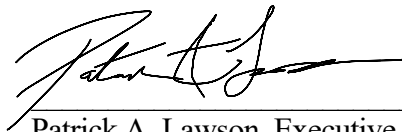
I, Patrick A. Lawson, certify that I am an officer of Northern Arapaho Tribal Industry, Inc. d/b/a Wind River Internet (the "Company"), and acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Section 64.2001, *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by a company at state commissions, in the court system or at the Commission) against data brokers in 2017. The company did not receive any customer complaints during 2017 concerning the unauthorized release of CPNI. The Company does not have any information outside of the information that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:



Patrick A. Lawson, Executive Manager

Date: February 28, 2019

Attachment: Accompanying Statement Explaining CPNI Procedures

**Northern Arapaho Tribal Industries, Inc. d/b/a Wind River Internet, Inc.**

**Statement Regarding Customer Proprietary Network Information Operating Procedures**

Northern Arapaho Tribal Industries, Inc. d/b/a Wind River Internet (“WRI”), in accordance with Section 64.2009(e) of the Commission’s rules, submits this statement summarizing how the WRI’s operating procedures are designed to ensure compliance with the Commission’s Customer Proprietary Network Information (“CPNI”) rules.

WRI provides interconnected Voice over Internet Protocol (“VoIP”) services, as well as Internet access services.

WRI values its customers’ privacy and takes measures to protect CPNI. WRI does not use, disclose or permit access to its customers’ CPNI except as permitted by Section 222 of the Communications Act of 1934, as amended, and the Commission’s implementing rules.

As necessary, WRI may use CPNI for the permissible purposes enumerated in the Act and the Commission’s rules, including, but not limited to, initiating, rendering, billing and collecting for telecommunications services. WRI may also use CPNI to protect its rights or property.

WRI has in place a process for verifying its customers’ identity during an inbound call. Except for business customers who have specifically authorized release of CPNI pursuant to a procedure established by contract, WRI does not release call detail information during an inbound call. WRI also requires customers to establish a password to be used authenticate the customer’s identity in order to access account information.

WRI trains its personnel in the use of CPNI. WRI has an express disciplinary process in place for violations of WRI’s CPNI policies.

WRI does not use CPNI to market products or services to customers outside of the category of service to which the customer already subscribes. WRI does not share CPNI with affiliates or third parties for marketing purposes. If, in the future, WRI seeks to use CPNI for these purposes, it will provide the appropriate notice to its customers and will maintain a list of customer preferences. WRI also will maintain a record of any marketing campaign in accordance with the Commission’s rules.

WRI takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. WRI has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach which results in the unauthorized access to, use or disclosure CPNI. WRI will maintain a record of the notification in accordance with the Commission’s rules.

WRI has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.